

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

(202) 955-9600

FACSIMILE

(202) 955-9792

www.kelleydrye.com

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November 22, 2002

GENEVIEVE MORELLI

DIRECT LINE (202) 887-1230

E-MAIL: gmorelli@kelleydrye.com

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TWB-204
Washington, D.C. 20554

Re: Request to Accept *Ex Parte* Presentation in CC Docket Nos. 01-338, 96-98, 98-147, Originally Filed on Friday, November 8, 2002

Dear Ms. Dortch:

The attached *Ex Parte* presentation, made on behalf of the PACE Coalition, was filed electronically with the Commission through ECFS on Friday, November 8, 2002. I have recently discovered that ECFS was not functioning properly that day and many filings such as ours were not properly accepted by the system. We therefore request that the attached be accepted as filed, in all three dockets referenced above, on November 8, 2002.

Copies of the original filing were sent to the members of the Commission staff present at the November 8, 2002 meeting, as listed on the original letter. If you have any questions concerning this submission, please contact the undersigned.

Respectfully submitted,


Genevieve Morelli

GM:cpa
Enclosure

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Re: *Ex Parte Presentation in CC Docket Nos. 01-338, 96-98, 98-147*

Dear Ms. Dortch:

Today, Rodney Page of Access Integrated Networks, Inc., Michael Ward of DataNet Systems, Joseph Gillan and the undersigned, representing the Promoting Active Competition Everywhere ("PACE") Coalition, met separately with Commissioner Copps' Legal Advisor Jordan Goldstein, and Commissioner Abernathy's legal advisor Matthew Brill, to discuss the position of the PACE Coalition regarding the future availability of local switching as an unbundled network element and the proper role of the state commissions in making unbundling decisions. The attached materials were distributed at the meetings.

In accordance with Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this letter with attachments is being provided to you for inclusion in the public record of the above-referenced proceeding. A copy of this submission is being provided to each member of the Commission staff present at the meeting.

Respectfully submitted,


Genevieve Morelli

cc: Jordan Goldstein
Matthew Brill
Qualex International

TruLocal from TruCommSM only \$29.95 per month

TruComm

INTRODUCING TruLocal from TruCommSM

3,000 local and local toll minutes included
4.9¢ per minute long distance

Features include:

- Caller ID with Name**
- Call Waiting
- 3-Way Calling
- Speed Dialing
- Call Waiting ID**
- Call Forwarding
- Automatic Call Back
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\$19.95 for a second line with
Caller ID with Name plus one feature.

Local, Local Toll, and Long Distance
phone service on one convenient monthly
TruBillSM with delivery and payment available via
the Internet or regular US mail. Your choice!

TruComm—Illinois' newest provider of residential
telephone service—**answers your tough questions**
about local, local toll, and long distance phone
service. **And you're going to love what you hear.**

TruComm cuts through all the mystery and
double talk of other companies giving you what
every telephone customer deserves...**dependable**
phone service for a fair price without the extra
charges. That's something the big phone companies
won't appreciate.

When you choose TruComm you're choosing honest
phone service at a better price.

\$29.95 for 3,000 local
and local toll minutes

4.9¢ a minute for all long
distance calls

Calling features
included

\$29.95 Residential phone service

\$29.95 for 3,000 local and local toll minutes

4.9¢ a minute for all long distance calls

Calling features included

\$19.95 for a second line

TruComm

Your Bottom-line Phone Company.SM
The best bottom-line deal for your residential phone service dollar.

Inside is one of the best and newest
residential phone service offers in Illinois—
TruLocal from TruCommSM

Sign up now, call

1-877-TruBillSM (877-878-2455) toll free
to start TruLocal from TruCommSM today!

Provide the Promotion Code below to receive
a discount on your first month's bill.

Promotion Code:

1000

Thank Your Illinois Legislators

Your freedom to choose your local telephone carrier
is brought to you by the Illinois General Assembly
through the Illinois Telecommunications Rewrite Act of 2001,
passed by a vote of 45-2 (Senate) and 112-1 (House)
over the objections of SBC Ameritech.
Please let your legislators know that you appreciate the right to
choose better local services at lower prices.
Remember, they voted for you.

You can contact your state Senator or state Representative by calling
217-782-2000 or on the web at www.legis.state.il.us

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TruComm
is...

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Residential
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\$29.95 per month for
clear reliable phone service.

4.9¢ per minute long
distance with no additional
long distance service charge.

\$19.95 per month for a second
line with Caller ID with Name plus
one feature. Add all features for \$4.95.

Best phone service without extra
charges. Unlike the competition which continues
to add those fees to phone bills each month.

TruBillSM—a phone bill easy to read and
understand. TruBillSM tells you the truth about what we
charge from the first day of service.

All services in one package with one monthly TruBillSM
choice for delivery and payment on the web or through the
mail. Your choice!

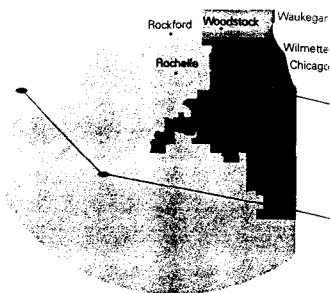
• \$29.95 for 3,000 local
and local toll minutes

• 4.9¢ a minute for all long
distance calls

• Calling features
included

Your Bottom-line Phone Company.SM

The best bottom-line deal for your residential
phone service dollar.



Local and local toll calls are both part of the LATA. Northeastern Illinois is all one LATA (dark blue). TruComm customers enjoy the freedom to call anywhere within this area for up to 3,000 minutes per month for \$29.95 with TruLocal from TruComm.SM

Outside of your LATA in Illinois and anywhere in the United States calls are only 4.9¢/min., anytime you call.

Why Choose TruComm?

Choosing TruComm allows you to keep your existing phone number and benefit from a calling package that provides everything you need in your residential phone service.

TruLocal from TruCommSM is combined local and local toll service for only \$29.95 a month, and an opportunity to save 30% to 50%, or more, on long distance. You can add a second line with Caller ID with Name plus one additional feature for only \$19.95 a month, and can add all the same features of the first line for \$4.95 a month.

Local and local toll service will be provided using your current network facilities. Should you ever have a network service problem, a TruComm telecommunications expert will deal

directly with the Ameritech network personnel to solve it so you won't have to.

Local call? LocalToll call?

Years ago, Illinois was divided into different calling regions or LATAs (see map showing the Chicago LATA). Calls within a LATA are often defined as either "local" or "local toll." Other phone companies charge you extra for local toll calls. Confused as to whether your calls are local or local toll? With TruComm it doesn't matter because there is no difference.

Woodstock to Kankakee? Wilmette to the Loop? Joliet to

Waukegan? North side of Chicago to the South side? These are local toll calls for which other companies charge in addition to the basic monthly charge. They add up and when those phone bills arrive you wonder what happened to the low cost local service. However, your TruComm TruBillSM bottom-line will be the low cost local service you expected.

With TruComm it's simple—\$29.95 includes every Illinois call inside your LATA, up to 3,000 minutes per month. No mystery. All other calls within the U.S. are long distance calls.

Depending on your personal calling patterns, you could discover that many of your in-

state calls are currently billed extra as local toll, but those would be included as part of your TruLocal from TruCommSM service.

Over 3,000 Minutes?

Not Likely. You would have to be on the phone for about 100 minutes each and every day. But if you do use more than 3,000 local and local toll minutes per month, your cost is just 2¢ per minute for those minutes, not the 4¢ to 10¢ per minute of other local carriers.

Some companies offer "unlimited local" calling packages, but don't include local toll calls. TruLocal from TruCommSM goes beyond local service and includes local toll calls under your basic charge. Save with TruLocal from TruComm.SM

4.9¢/minute Long Distance?

Absolutely. TruComm long distance offers one low rate for long distance calls across the U.S. Every long distance call you make is only 4.9¢ per minute, day or night, seven days a week. Call where and when you want. Your long distance minutes are 4.9¢ each.

Can I Get Caller ID?

Caller ID and more! TruLocal from TruCommSM includes ALL of these convenient calling features:

Caller ID with Name**
Call Waiting
3-Way Calling
Speed Dialing
Call Waiting ID**
Call Forwarding
Automatic Call Back
Repeat Dialing

You won't pay extra for any of these features.

Call toll free now
1-877-TruBillSM (877-878-2455)

But if your bill is with another service, it probably has confusing extra fees and charges that add up to far more than you thought you would be paying. Does your monthly bill actually match the deal to which you thought you signed up?

Check last month's bill. If you paid something called a "Network Access Fee" or a "Federal Access Charge," or something similar, you paid too much! It's just one more way the other phone companies charge you more. How many other unnecessary fees are you paying each month?

Now imagine a phone bill that actually makes sense.

Or better yet... imagine a phone company that charges you what they said they would.

TruComm's TruBillSM is clean, simple, and easy to understand.

You won't see — nor will you pay — unnecessary charges or fees. Sure, there are the required taxes and a handful of fees collected for the government, but not disguised extra charges. We don't know how else to say it.

TruBillSM on the web or in the mail.

Choose the billing and payment method that's best for you — via the web or through the mail. Select the web and receive a monthly email notice that your TruBillSM is posted. Details about your charges are just a click away. Or choose to receive a paper TruBillSM through the mail. Regardless of how you choose to receive your TruBillSM, pay electronically online or by mail. It's up to you. Credit cards or check payments accepted.

Monthly Phone Service Comparison

(Offerings as of August 12, 2002)

	TruComm TruLocal	MCI Neighborhood Choice	Z-Tel Z-Line Home (Select)	Ameritech Economy Solution	AT&T Call Plan Unlimited [†]	TDS MetroCom Feature Rich
Basic charge[§]	\$29.95	\$28.99[†]	\$29.99[†]	\$31.95[†]	\$29.95[†]	\$25.00
Network charge	Included	\$6.00	\$6.12	\$4.49	\$4.45	\$4.45
Number portability	Included	\$0.28	\$0.28	\$0.28	\$0.28	\$0.28
Local (0-15 miles)	Included*	Incl.	Incl.	Incl.	Incl.	Incl.
Local toll (15 miles+ in LATA)	Included*	7¢/min.	7¢/min.[‡]	10¢/min., after 60m	4¢/min.	7¢/min., after 60m
Long Distance	4.9¢/min.	7¢/min.	7¢/min.[‡]	Not Applicable	7¢/min.	7¢/min.
Features	Included (♦)	Included (♦)	Included (♦)	Included (♦)	Included (♦)	Included (♦)
Caller ID with Name ^{**}	♦	♦	♦	♦	♦	\$5.75
Call Waiting	♦	♦	♦	♦	pick 2 of 6	♦
3-way calling	♦	♦	♦	extra charge	pick 2 of 6	♦
Speed dialing	♦	♦	♦	extra charge	pick 2 of 6	extra charge
Call Waiting ID ^{**}	♦	♦	♦	extra charge	extra charge	extra charge
Call forwarding	♦	♦	♦	extra charge	pick 2 of 6	♦
Call back	♦	extra charge	extra charge	extra charge	pick 2 of 6	♦
Repeat dialing	♦	extra charge	extra charge	extra charge	pick 2 of 6	extra charge
Bottom Line[§]	\$29.95	\$42.27	\$39.89	\$40.72	\$38.68	\$38.28

* First 3,000 minutes of Local and Local Toll calls included in TruLocal from TruCommSM service.

** Caller ID equipment required.

† AT&T Call Plan Unlimited with 3 Feature Package Enhanced.

‡ Does not include directory assistance or operator assisted calls.

† Includes calls to others on same company network.

° Includes Line-Backer.[®]

‡ After 50 minutes of combined local toll and long distance.

§ Bottom Line assumes 100 minutes of local toll. Your actual usage may vary. Government taxes and fees not included.

Get TruLocal from TruCommSM Today



\$29.95 Residential phone service

\$29.95 for 3,000 local and local toll minutes

4.9¢ a minute for all long distance calls

Calling features included

\$19.95 for a second line

Sign up now, call

***1-877-TruBillSM (877-878-2455) toll free
to start TruLocal from TruCommSM today!***

***Provide the Promotion Code below to receive
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* First 3,000 minutes of Local and Local Toll calls included in TruLocal from TruCommSM service.

** Caller ID equipment required.

~ AT&T Call Plan Unlimited with 3 Feature Package Enhanced.

◇ Does not include directory assistance or operator assisted calls.

† Includes calls to others on same company network.

• Includes Line-Backer.[®]

‡ After 50 minutes of combined local toll and long distance.

§ Bottom Line assumes 100 minutes of local toll. Your actual usage may vary. Government taxes and fees not included.

082602-50000

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Monthly Phone Service Comparison

(Offerings as of August 12, 2002)

	TruComm TruLocal	MCI Neighborhood Choice	Z-Tel Z-Line Home (Select)	Ameritech Economy Solution	AT&T Call Plan Unlimited™	TDS MetroCom Feature Rich
Basic charge°	\$29.95	\$28.99†	\$29.99†	\$31.95°	\$29.95†	\$25.00
Network charge	Included	\$6.00	\$6.12	\$4.49	\$4.45	\$4.45
Number portability	Included	\$0.28	\$0.28	\$0.28	\$0.28	\$0.28
Local (0-15 miles)	Included*	Incl.	Incl.	Incl.	Incl.	Incl.
Local toll (15miles+ in LATA)	Included*	7¢/min.	7¢/min.†	10¢/min. after 60m	4¢/min.	7¢/min. after 60m
Long Distance	4.9¢/min.	7¢/min.	7¢/min.†	Not Applicable	7¢/min.	7¢/min.
Features	Included (❖)	Included (❖)	Included (❖)	Included (❖)	Included (❖)	Included (❖)
Caller ID with Name**	❖	❖	❖	❖	❖	\$5.75
Call Waiting	❖	❖	❖	❖	pick 2 of 6	❖
3-way calling	❖	❖	❖	extra charge	pick 2 of 6	❖
Speed dialing	❖	❖	❖	extra charge	pick 2 of 6	extra charge
Call Waiting ID**	❖	❖	❖	extra charge	extra charge	extra charge
Call forwarding	❖	❖	❖	extra charge	pick 2 of 6	❖
Call back	❖	extra charge	extra charge	extra charge	pick 2 of 6	❖
Repeat dialing	❖	extra charge	extra charge	extra charge	pick 2 of 6	extra charge
Bottom Line§	\$29.95	\$42.27	\$39.89	\$40.72	\$38.68	\$38.28

AmeriFacts

AMERITECH DISPLAYS CONTEMPT FOR ILLINOIS GOVERNMENT

In 1992 the General Assembly rewrote the Illinois Public Utilities Act to promote the development of competition for local telephone service. Among other new provisions, the rewrite created Section 13-505.5 enabling carriers to petition the Illinois Commerce Commission ("Commission") for the provision of new services from the local exchange monopoly upon a showing that the services are technically and economically practicable, and Section 13-505.6 permitting the local exchange monopoly to petition the Commission for an alternative to rate of return regulation. The Commission granted Ameritech's alternative regulation petition to permit unlimited profits for the express purpose of Ameritech's claimed need to offset anticipated revenue losses from imminent new local exchange competition. The Commission granted WorldCom's Section 13-505.5 petition requiring Ameritech to allow use of the public local exchange's network elements to provide competitive local telephone service. While Ameritech has reached a new record level of profit for each successive quarter since the alternative regulation petition was granted, Ameritech has correspondingly refused to comply with the Commission's orders to provide competitors with the network elements that the Commission has found essential to develop local competition.

1995

October 19th - WorldCom petitions the Commission under Section 13-505.5 for the nation's first provision of a network elements platform and of unbundled network elements to provide competitive local exchange service. The platform allows competitive local exchange companies to lease the combination of the three network elements, loop, switch, and shared transport, or fewer unbundled elements, to provide end-to-end local telephone service in competition with Ameritech.

1996

June 26th - The Commission grants the WorldCom platform petition under Section 13-505.5 of the Illinois Act. Among other holdings, the Commission order held: (1) that "Staff also identified the local exchange network as consisting of three components: loop, (switch), and inter-office (shared) transport ... Staff recommended modification of the original (WorldCom) request to make the three components available on an unbundled basis, which may be combined for end-to-end transmission"; (2) "that requiring Ameritech ... to make these unbundled network elements available will further our goal of promoting competition in the local exchange marketplace"; (3) "the parties concur that (long run service incremental cost) is the cost-based (pricing) standard ... The Commission agrees with Staff that Ameritech ... use ... (its) 'best judgment' in developing prices for the (platform) and be prepared to file the appropriate costs support and explanation ... used in determining the price"; (4) "We also reject Ameritech's position that the purchasing carrier should not retain the revenues for exchange access provided through the leased network elements" approximately 1/3 of the platform's revenues; and (5) "that Ameritech Illinois ... within 30 days ... should file tariffs to implement the platform proposal of (WorldCom), as modified by the Commission Staff". ("Platform I")

August 2nd - Ameritech's request to delay the date for filing the platform compliance tariff is denied after extensive debate. Ameritech refuses to file the platform compliance tariff in defiance of the Commission's orders.

August 8th - After bringing the Illinois Commerce Commission staff in house to show how the Illinois network elements platform works, the Federal Communications Commission orders the Illinois platform as the national standard under the federal Telecommunications Act of 1996 ("Federal Act").

September 27th - Ameritech files the platform "compliance tariff" with: (1) charges for the platform based on Ameritech's retail service rates, not costs; and (2) a tariff requirement that Ameritech keeps all access fees for the access services provided by the platform. Both are in direct violation of the Commission's Platform I Order.

November 7th - Commission opens the first platform compliance docket ("Platform II"). The competitive local exchange carriers are unable to purchase the platform during pendency of the Platform II docket.

November 26th - Commission enters order in AT&T/Ameritech Interconnection Agreement arbitration requiring Ameritech to provide AT&T with the platform and shared transport. Ameritech refuses to provide the platform or shared transport in direct violation of Commission's order.

1997

July 18th - U. S. Court of Appeals 8th Circuit confirms the platform requirement under the Federal Act.

August 18th - Federal Communications Commission orders Ameritech to provide shared transport. Ameritech refuses to obey the FCC order to provide shared transport and argues in Platform II for Illinois Commerce Commission to reject shared transport.

1998

February 17th - Commission issues its platform compliance order ("Platform II") 20 months after the Platform I order. (1) Commission affirms the platform requirement under the Illinois Act; (2) "This Commission finds that Ameritech's (switch) proposal conflicts with the FCC's Order, and with this Commission's Order in the (Platform I) Case, in at least three fundamental respects. ... (T)he FCC has made it explicit ... (and) (t)his Commission similarly ruled in (Platform I) that carriers purchasing the switch platform are entitled to provide access and receive the associated revenues. ... Ameritech's plan to retain originating and terminating access is in contravention of the (Federal) Act and the FCC's and this Commission's orders." (3) Commission finds that Ameritech set CLEC rates for use of the network switches based on Ameritech's retail rates instead of Ameritech's costs in violation of the Platform I order, specifically noting that despite entering into switch purchase contracts immediately before the Platform II proceeding commenced, "Ameritech conveniently did not include these contracts in its switching study" in any of the three rounds of testimony Ameritech subsequently filed; "Therefore, we require Ameritech to file a new (switch) cost study which establishes prices primarily based on the flat-rate terms of its vendor contracts"; (4) Commission orders Ameritech to provide shared transport for the platform, finding that "Ameritech Illinois has been quite zealous in resisting the notion of providing (shared) transport" and "that Ameritech

Illinois' positions ... are inconsistent with prior Commission Orders. ... (W)e agree with WorldCom that it is essential that Ameritech Illinois make the shared transport offering available immediately" resulting in the Commission setting a specific rate for the shared transport; (5) Commission orders Ameritech to file within 45 days tariffs in compliance with Platform II order.

February 18th – At CLECs' request, the Commission opens a Notice of Inquiry to investigate structurally separating Ameritech's retail services from the carrier network elements to enforce the Commission's attempts to promote local exchange competition.

April 3rd - Ameritech files Platform II "compliance tariff". The shared transport network element has no rates provided in the tariff. Ameritech refuses to provide shared transport under the Platform II order claiming that the Ameritech tariff supercedes the Commission's order. Ameritech also refuses to provide the shared transport under the Ameritech tariff since Ameritech has not listed any rate and is therefore unable to charge for the shared transport. Ameritech refuses all CLEC orders for shared transport or for the platform.

June 3rd - Commission opens the second tariff compliance docket ("Platform III") investigating Ameritech's second network elements tariff. CLECs remain unable to purchase the platform to provide competitive local exchange services.

August 10th - U.S. Court of Appeals 8th Circuit rules that Ameritech must provide shared transport. Ameritech continues to refuse to provide shared transport.

December - Verizon makes the Illinois platform available in New York. Over 1,000,000 consumers switch to competitive local exchange providers using the platform, 95% of them residential, by July, 2000 according to the US Department of Justice. Ameritech refuses to provide the platform in Illinois, in violation of the Commission's order.

1999

February 9th - Commission concludes that it lacks statutory authority to order the structural separation of Ameritech's retail and carrier operations to enforce local exchange competition.

August 27th – SBC makes the Illinois platform available in Texas. Over 569,000 consumers switch to competitive local exchange providers using the platform by September, 2000 according to the US Department of Justice. Ameritech refuses to provide the platform in Illinois, in violation of the Commission's order.

September 21st – Upon demand by the Commission in the SBC/Ameritech merger proceeding, Ameritech files an interim shared transport tariff. Tariff is incompatible with the platform and the rates are many times the SBC Texas rate.

September 23rd – Commission approves the SBC/Ameritech merger conditioned upon Ameritech filing within 30 days after its merger closes an interim platform tariff at the rates made available by SBC in Texas and to provide the platform that is already operating in Texas. The Commission's merger approval is followed immediately by the FCC's approval, completing the merger.

October 8th - Ameritech files its interim shared transport tariff after the Commission's approval of the SBC/Ameritech merger. Tariff rates for shared transport are over 10 times the SBC rate in Texas, in direct violation of the Commission's SBC Ameritech Merger condition.

December 25th - Ameritech admits under oath that it still is not providing the platform.

2000

October 8th - Ameritech's third platform tariff begins. Tariff rates for the switch eliminate flat-rate terms and rates for the shared transport remain twice the SBC Texas rate, both in direct violation of the Commission's Platform II order.

October 23rd - On the opening day of the Platform III hearing, after months of data investigation and the filing of expert witnesses' testimonies, Ameritech attempts to dismiss the two year old compliance investigation on the basis that the tariff under investigation is superseded by Ameritech's October 8th tariff and that the Commission cannot order any changes in services in this proceeding. The hearing examiner concludes that a new proceeding must be initiated to require future compliance, but continues the proceeding to investigate Ameritech's past compliance.

November 1st - Commission begins a third compliance proceeding ("Platform IV") to investigate Ameritech's October 8th tariff.

2001

Today - Platform III and Platform IV compliance hearings proceed to determine if Ameritech is in compliance with the 1999 Merger order requiring Ameritech to comply with the 1998 Platform II order requiring Ameritech to comply with the 1996 Platform order. Meanwhile, Ameritech continues over 6 consecutive years of record profits under the alternative regulation order, created on the premise of competition in local exchange services that would offset excessive monopoly profits, while overall capital investment in the largest competitive local exchange carriers ("CLECs") drops from \$155 billion to \$25 billion in the past year. Capital investment is no longer available to CLECs.

Provided by the Competitive Local Exchange Coalition of Illinois ("CLECs of Illinois").

AmeriFacts

2002 Supplement

2001

May 31st – Illinois General Assembly passes Public Act 92-0022, the Illinois Telecommunications Rewrite Act of 2001, over SBC Ameritech's objections, by a vote of 45-2 in the Senate and 112-1 in the House. The Act codifies the Illinois Commerce Commission's existing orders to develop local competition, including requirements for interconnection, collocation, network elements, the network elements platform, and operational support systems. Stronger enforcement provisions are enacted, including granting the ICC the authority to award damages and to issue penalties of up to \$250,000 per day for violations.

June 30th – P.A. 92-0022 becomes effective.

September 26th – Commission initiates proceeding to review Ameritech's compliance with P.A. 92-0022 ("Platform V").

October 16th - Commission issues its Platform III compliance order 66 months after the Platform I order. (1) Commission's review of Ameritech's nonrecurring cost studies finds that "[i]t is apparent here that Ameritech gamed the system..." (2) Regarding Ameritech's switch tariff, the Commission further held that "[w]e find Ameritech's argument wholly disingenuous and designed to stave off the inevitable conclusion that Ameritech's (switch) offering fails to comply with our prior orders. The real question is not whether it complies with our prior orders, but how many of our prior orders it defies."

2002

June 11th – Commission issues its Platform V order requiring Ameritech to make numerous changes in the Ameritech tariff as unauthorized restrictions noncompliant with P.A. 92-0022.

July 5th – Ameritech changes rate for residential calls between 8 – 15 miles from charging for each minute of use to \$.05 per call in response to local competitors' flat rate offerings.

July 10th – Commission issues its Platform IV order, again finding that Ameritech did not even attempt to implement the Commission's directive in the Platform II order of February 17, 1998, the first compliance proceeding. "Although Ameritech was provided this opportunity, it did not even attempt to demonstrate what, if any, cost it incurs to activate a switch. Instead, Ameritech chose to ignore the direction of the Commission to file a (switch) cost study that establishes prices primarily based on the flat-rate terms of its vendor contracts . . . While we disagree that Alternative #2 complies with our directives, we agree with Ameritech's witness that its other proposals do not comply with the TELRIC (Platform II) Order." Commission orders Ameritech to file a tariff in

compliance with the Commission's order and authorizes the Commission Staff to review and correct any sections of the tariff not in compliance with the order pursuant to the Commission's new enforcement powers under P.A. 92-0022.

September 4th – While Ameritech's Platform IV compliance tariff is under Staff review, Ameritech files a superceding UNE tariff with rates 100% to 1100% higher than those ordered by the Commission, and with other additional conditions, in direct defiance of the Commission's orders and of the facts found after exhaustive expenditure of the Commission's and the competitive carriers' resources in the previous dockets.

October 15th – After the Commission receives letters of objection to Ameritech's September 4th tariff urging the Commission to reject Ameritech's tariff and to initiate a Commission investigation of Ameritech for anticompetitive activity with penalties of \$250,000 per day from the date of filing of the September 4th tariff, Ameritech withdraws the September 4th tariff.

November 6th – Ameritech announces unlimited local calling plan charges capped at \$13.50 a month and cuts the price for two feature-laden service packages by about 10% each. Second major rate reduction in 2002 in response to heated local calling competition.

BUSINESS

Ameritech must stop 'misleading' plan offer

ICC says discount package can cost more than regular service

By Robert Manor
Tribune Staff Writer
January 24, 2001
Chicago Tribune

The Illinois Commerce Commission on Tuesday ordered Ameritech to stop plying its customers with "misleading" offers of a discount-calling plan that often costs more than regular phone service.

Ameritech has endured withering criticism from consumer advocates and others in recent years for alleged excesses in marketing—for example, trying to sell expensive phone packages and second phone lines to nursing-home residents. Tuesday's sternly worded ICC decision, consumer advocates said, is a sign that regulators will not tolerate deceptive marketing practices by phone companies.

At issue in the ICC action was Ameritech's SimpliFive calling plan. SimpliFive offers discounts on calls made to places 15 miles or more away. But the plan charges more for calls to locations within 15 miles than Ameritech's basic phone service does.

The ICC said Ameritech knew at least since early 1998 that its SimpliFive calling plan—which purported to offer a savings—actually cost many consumers more money than they would have paid under Ameritech's basic phone service. Yet, the commission said, Ameritech continued to tell people they could save by switching to SimpliFive.

Ameritech's "SimpliFive marketing practices are misleading, and as such, are unjust, unreasonable," the commission wrote. The order, which levied no financial penalty, was approved unanimously by the ICC's five commissioners.

The ICC action is just the latest incidence of regulatory and consumer impatience with Ameritech. The company has come under increasing criticism for its marketing practices, especially since it was taken over by San Antonio-based SBC Communications Inc. in 1999. Ameritech was roasted last year by regulators in five states for poor response to service calls.

An Ameritech spokesman played down the significance of the ICC's decision on SimpliFive, saying the company has not marketed the service in two years.

SimpliFive, said Ameritech spokesman Dave Pacholczyk, was meant to offer consumers an alternative to the confusing thicket of phone rates and charges offered in Illinois. "It's a plan that customers turn to for simplicity, not necessarily lower costs," Pacholczyk said.

The SimpliFive issue surfaced a year ago when the Citizens Utility Board released a study showing that customers who sign up for SimpliFive stood to lose \$22 to \$150 a year, depending on their calling patterns.

Many people rarely call more than 15 miles from their home, the study said, meaning they would see little benefit from SimpliFive.

It has never been revealed how many customers have subscribed to SimpliFive. But according to evidence gathered by the ICC, many thousands of consumers bought into the Ameritech plan.

CUB filed a complaint with the ICC alleging that Ameritech was violating the Illinois Consumer Fraud and Deceptive Practices Act, and on Tuesday the commission upheld many of the consumer group's allegations and ordered the violations stopped.

Ameritech is prohibited "from conveying the net impression to any customer that, by subscribing to SimpliFive, that customer will incur lower total monthly usage charges," the ICC said.

The ICC stopped short of saying Ameritech had committed consumer fraud, however. "We use the word misleading," said commission spokesman David Farrell. "We don't use the word fraud."

Nevertheless, CUB described the ruling as a victory.

"We think it's an important decision by the commission," said Robert Kelter, a CUB attorney. "It sends a signal that they are going to be active in watching marketing."

CUB did not win all it wanted. The ICC declined to order Ameritech to refund overcharges to customers victimized by SimpliFive. In its order the commission said that under the state's consumer fraud laws, it does not have the authority to order refunds.

Illinois' telecommunications laws are to be rewritten soon and Kelter said CUB will push lawmakers to give the ICC the ability to order refunds to consumers.

CUB said that internal Ameritech documents showed that the company had targeted SimpliFive to some customers who the company believed would pay more for the plan than they would by using basic phone service. "Company training manuals instructed service representatives to sell the plan even when they knew it would raise a customer's bills," CUB said.

But Pacholczyk, the Ameritech spokesman, said the company is not alone in offering calling packages like SimpliFive. "All competitors sell similar packages," Pacholczyk said. "To hold us to a different standard is absurd."

Pacholczyk said the ICC found nothing wrong with CallPack, another calling plan CUB had complained about.

CUB, however, says Ameritech's pitches to consumers have grown more intense since the company's merger with SBC. CUB has been critical, for instance, of Ameritech's past attempts to sell its Best Value Pack bundle of services and a second phone line to all customers. The service costs 260 percent more than basic phone service.

In newspaper reports last year, Ameritech executives said they had no problem with pitching Best Value Pack—which includes caller ID, voicemail, three-way calling, call back, call forwarding, repeat dialing and wiring insurance—to nursing home residents and people who have trouble paying phone bills.

Customer service representatives said at the time they were pressured into heavy-handed sales pitches after SBC took control.

Some of Ameritech's marketing woes predate the merger, however. In 1997 Ameritech paid \$266 million to settle a class-action lawsuit that alleged the company was charging customers for its "Linebacker" service

without their knowledge. That service, which cost \$3 to \$5 a month, was insurance against the extremely rare occurrence of phone line damage inside a customer's home.



BUSINESS

Ryan signs overhaul of Illinois phone laws

Associated Press

June 28, 2001

Illinois residents who wait a long time for new phone lines or repairs could get refunds under a bill Gov. George Ryan signed today that aims to make phone companies more accountable for poor service.

The new regulations will replace 15-year-old laws that were drafted before companies were allowed to compete for local phone customers. They allow state regulators to levy harsh fines against phone companies for failing to meet state standards.

"It is in our best interests as a state to make sure that the ground rules for the telecom industry are fair, flexible and designed to keep all of Illinois moving forward," Ryan said in a prepared statement.

The old phone regulations were set to expire Sunday. That deadline and a flood of customer complaints against Ameritech last year over long service delays spurred lawmakers to act.

The bill represents a compromise between opposing plans backed by dominant carriers Ameritech and Verizon and their competitors, including AT&T.

Ameritech, which has been accused of blocking competitors from using its network, will face much higher fines for failing to meet competitive standards.

Customers will get flat rates for local service, rebates if service is bad and can easily switch carriers to find the best deal.

In return, the state will no longer limit what Ameritech can charge for business service and residential extras such as call forwarding. Those changes will take effect over two years.

Customers who wait more than five days for a new phone line or more than 24 hours for repairs will get rebates or the use of a cellular phone while they wait. Customers also will get a \$50 credit if phone workers fail to show up for an appointment without giving 24 hours notice.

The bill also gives the poor more help to pay for phone service and provides funding to offer rural and urban areas better access to high-speed Internet connections. Ameritech and GTE/Verizon will have four years to bring high-speed service to 80 percent of their customers.



BUSINESS

Ameritech sets flat-rate call plan

\$12.50 will cover all local calls for a month

By Jon Van

Tribune staff reporter

July 20, 2001

For people tired of nickel and diming their local phone calls, Ameritech will launch a new flat-rate plan in September for unlimited local calling and a new cut-rate package for people who don't use their phones much.

The plans are in response to a new state law and advice from regulators about how to improve phone service for the Chicago region.

Under the new packages, which Ameritech plans to file Friday with the Illinois Commerce Commission, a customer could pay \$12.50 a month to make all the local calls he wanted for no added charge.

Another new plan would provide 30 local calls a month for 50 cents with a dime-a-call rate for any calls over 30.

"We believe these are pretty attractive price points," said Michael King, an Ameritech spokesman. "We've worked with the commerce commission staff and talked to legislators in setting these prices."

Martin Cohen, executive director of the Citizens Utility Board consumer advocacy group, praised Ameritech for acting quickly to launch a flat-rate plan, but cautioned that most customers will not benefit from this package.

"This is designed for high-volume customers," Cohen said. "The \$12.50 charge replaces the local calling payment on the lower right at the bottom of your phone bill. If that amount is now lower than \$12.50, this plan won't help you."

Ameritech's current basic calling plan charges a nickel for every call made to someone less than 8 miles away and a nickel plus a fraction of a cent per minute for calls between 8 and 15 miles.

Local toll calls over 15 miles cost 5 to 10 cents a minute depending upon the calling plan and carrier.

A household making six or eight calls a day to someplace more than eight miles away would probably save money on the \$12.50 flat-rate plan, especially if those calls last a long time.

Someone who makes fewer than one call a day might save with the new 50-cent plan, but anyone who makes fewer than 10 calls a month might find it cheaper to keep the present basic plan.

As a general rule, people who make 10 to 40 calls a month probably would save a small amount by opting for the 50-cent plan, Cohen said.

The charges are in addition to Ameritech's line fees--which start at \$2.50 a month in Chicago and go as high as \$9 a month in rural locations--and various other fixed monthly taxes and fees.

Once the new rates are filed with the ICC, it will take 45 days until they can legally be offered, said Ameritech's King.

"We're required by law to offer flat rates, but we're not required to switch customers to them," he said. "It will be up to customers to look at their bills and determine if their calling patterns make these new rates attractive. They will have to tell us if they want the new packages."

Cohen said that CUB is likely to argue that the \$12.50 amount should be lowered so that more customers can benefit from flat-rate calling.



BUSINESS

Ameritech switches to 5 cent calls

By Jon Van

Tribune staff reporter

Published July 11, 2002, 4:11 PM CDT

The nickel phone call has made a comeback in Chicago.

SBC Ameritech no longer charges by the minute for local calls. The change, which took effect last week, is Ameritech's response to rivals that promote flat rate calling plans.

The old system had been among the most complex local rate systems in the country: Calls made to someone less than eight miles away were a nickel per call, but calls to someone 8 to 15 miles away were billed according to how long they lasted.

So someone in downtown Chicago who called a friend in Evanston to talk for 20 minutes would be charged 15 cents. But if he called someone living near Wrigley Field, it would cost only a nickel.

Under the new plan both calls would be a nickel, no matter how long they last.

"We did this as a way to simplify our price structure," said Carrie Hightman, president of Ameritech Illinois. "Customers have complained our rate structure was too complicated."

Local toll calls to someone more than 15 miles from the caller are still billed at a dime a minute, so a 20-minute call from downtown Chicago to Waukegan would be \$2.

Hightman noted that Ameritech now offers several flat rate plans and some include unlimited toll calls. But most such plans are designed for customers who spend at least \$30 a month on local service. The rate simplification will apply to the majority of customers who don't opt for a special call package.

Under the new system, rates drop during off hours. So a call placed at night costs 3 cents instead of a nickel.

"This is good news," said Martin Cohen, executive director of the Citizens Utility Board, a Chicago-based consumer group. "It will make it easier for people to understand their phone bills."

Those most affected by the change may be computer users who access the Internet using phone lines. If their Internet service provider is less than 15 miles away, it will cost five cents each time they go online, no matter how long they keep their connection.

"Not a day goes by that we don't get a call from someone who gets a phone bill for \$1,000 because they left their computer online and incurred charges by the minute," said Cohen. "That will still happen if your Internet provider is more than 15 miles away, but this is a step in the right direction."

Ameritech's simplification move is part of \$24 million in rate reductions mandated by the state's regulatory system.

Another slight change also occurred this month that will add 4 cents to residential subscriber line fees and subtract 3 cents from those fees paid by business customers. Both residences and business customers will now be charged \$4.49 a month for that fee, which covers long distance connectivity.

Cohen said an extensive reconfiguration of Ameritech's rates should be enacted by the Illinois Commerce Commission later this summer, one he hopes will result in further reductions as well as a one-time rebate of \$50.

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BUSINESS

Ameritech caps calling costs Move a reaction to rivals' flat-rate local packages

By Jon Van
Tribune staff reporter
Published November 7, 2002

In a move to counter competitive threats from other phone service providers, SBC Ameritech said Wednesday that it is putting a cap on the monthly price for unlimited local calling.

The unlimited calling plan will be capped at \$13.50 a month. Additionally, Ameritech is cutting the price for two of its feature-laden service packages by \$4 each, a reduction of about 10 percent.

The price cuts, Ameritech's second major rate reduction this year, are a response to heated local calling competition from AT&T, MCI and others, who have been siphoning customers with flat-rate local calling packages.

Ameritech executives estimate the latest reduction will knock \$24 million a year off customer bills.

Carrie Hightman, president of Ameritech Illinois, said she hopes the lower rates will help her firm retain existing customers and win back some defectors. Also, Ameritech wants to convince consumers who now use wireless phones to return to more traditional phone use.

"We have to work at building business on all fronts," she said. "That's what the competition does."

In July, Ameritech eliminated its long-standing practice of charging by the minute for some local calls and dropped some other rates for an estimated reduction of \$30 million a year.

"These are the first fruits of competition seen by consumers," said Wayne E. Huyard, president of MCI, the unit of WorldCom Inc. that is one of Ameritech's most vigorous competitors. "Some of the most vibrant competition in the country is in Michigan and Illinois, and customers are really benefiting."

The new Ameritech cuts are especially consumer friendly because they don't require customers to sign up for anything to get the benefits, said Martin Cohen, executive director of the Citizens Utility Board. "Even people who never shop around may see their bill go down if

they use their phones a lot," Cohen said.

Ameritech charges 3 cents to a nickel for each local call that travels less than 15 miles, Cohen noted, so people who make more than 350 to 400 calls a month will benefit because their total calling charge will stop when they hit \$13.50. Ameritech already offers unlimited local calling for \$12.50 a month, he said, but the new cap may be a better deal.

"If you're on the \$12.50 plan, you pay that much every month, even if you're out of town three weeks and make very few local calls," he said. "With the cap, you only pay for what you use up to \$13.50.

"I don't see any downside for anyone in this."

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Access' Southeastern Presence

- ◆ 1,058 towns/cities
- ◆ 112,500 lines
- ◆ Approximately 37,500
small business
customers

Line Count for AL
Access Integrated Networks, Inc.
As of 11/01/2002

City
ALABASTER
ALBERTVL
ALEXANDRCY
ANNISTON
ATHENS
ATTALLA
AUBURN
BAYMINETTE
BELLEFONTN
BESSEMER
BIRMINGHAM
BOAZ
BREWTON
BRIDGEPORT
CALERA
CARBONHILL
CENTREVL
CHELSEA
CHILDERSBG
CITRONELLE
CLANTON
CLAYTON
COLUMBIANA
CORDOVA
COURTLAND
CULLMAN
DADEVILLE
DECATUR
DEMOPOLIS
DORA
EUFAULA
EUTAW
EVERGREEN
FAIRHOPE
FLOMATON
FLORENCE
FORT PAYNE
FT DEPOSIT
GADSDEN
GARDENDALE
GOODWATER
GRAYSVILLE
GREENSBORO
GUNTERSVL
GURLEY
HANCEVILLE
HARTSELLE
HAZELGREEN
HUNTSVILLE
HURTSBORO
JACKSON
JACKSONVL
JASPER
KILLEN
LAFAYETTE
LEIGHTON
LEXINGTON

Line Count for AL
Access Integrated Networks, Inc.
As of 11/01/2002

City
LINDEN
LIVINGSTON
MADISON
MAPLESVL
MARION
MCINTOSH
MOBILE
MONTEVALLO
MONTGOMERY
MOULTON
MT VERNON
MUNFORD
OHATCHEE
OPELIKA
PARRISH
PHENIXCITY
PIEDMONT
PINSON
PRATTVILLE
RED BAY
ROGERSVL
RUSSELLVL
SELMA
SHEFFIELD
STEVENSON
SYLACAUGA
TALLADEGA
THOMASVL
TOWN CREEK
TROY
TUSCALOOSA
TUSKEGEE
UNIONTOWN
VINCENT
W BLOCTON
WARRIOR
WETUMPKA
YORK

Line Count for FL
Access Integrated Networks, Inc.
As of 11/01/2002

City
ALACHUA
ARCHER
BALDWIN
BELLEGLADE
BOCA RATON
BOYNTONBCH
BRONSON
BROOKSVL
BUNNELL
CANTONMENT
CEDAR KEYS
CENTURY
CHIEFLAND
CHIPLEY
COCOA
COCOABEACH
CORAL SPG
CROSS CITY
DAYTONABCH
DEBARY
DEERFLDBCH
DELAND
DELEON SPG
DELRAY BCH
DELTONA
DUNNELLON
EASTORANGE
EAU GALLIE
FERNADNBCH
FLAGLERBCH
FORTPIERCE
FTLAUDERDL
GAINESVL
GENEVA
GRACEVILLE
GREENCVSPG
GULFBREEZE
HAVANA
HAWTHORNE
HOBE SOUND
HOLLEYNVRR
HOLLYWOOD
HOMESTEAD
JACKSOLBCH
JACKSONVL
JENSEN BCH
JULINGTON
JUPITER
KEYS
KEYSTN HTS
LAKE CITY
LAKE MARY
LYNN HAVEN
MELBOURNE
MERRITT IS
MIAMI
MICCO

Line Count for FL
Access Integrated Networks, Inc.
As of 11/01/2002

City
MIDDLEBURG
MILTON
NEWBERRY
NORTH DADE
NWSMYRNBCH
OLD TOWN
ORANGEPARK
ORLANDO
OVIEDO
PACE
PAHOKEE
PALATKA
PALM COAST
PANAMACITY
PENNEYFRMS
PENSACOLA
PERRINE
PIERSON
PNAMACYBCH
PNTVDRABCH
POMPANOCH
PTST LUCIE
SANFORD
SEBASTIAN
ST JOHNS
STAUGUSTIN
STUART
SUNNYHILLS
TITUSVILLE
TRENTON
VERNON
VERO BEACH
WEEKICHSPG
WELAKA
WINTERPARK
WPALMBEACH
WPALMBEACH
YANKEETOWN
YONGSTFNTN
YULEE

Line Count for GA
Access Integrated Networks, Inc.
As of 11/01/2002

City
ADAIRSVL
ALBANY
AMERICUS
ARLINGTON
ATHENS
ATLANTA
ATLANTA NE
ATLANTA NW
ATLANTA SO
AUGUSTA
BACONTON
BAINBRIDGE
BARNESVL
BAXLEY
BLACKSHEAR
BOGARTSTHM
BOWDON
BREMEN
BRUNSWICK
BUCHANAN
BUFORD
CALHOUN
CAMILLA
CARROLLTON
CARTERSVL
CAVESPRING
CEDARTOWN
CLAXTON
CLERMONT
COCHRAN
COLQUITT
COLUMBUS
CONCORD
CONYERS
CORDELE
COVINGTON
CUMMING
CUSSETA
DUBLIN
EASTMAN
EATONTON
ELBERTON
FAIRMOUNT
FLOWEYBRCH
FORSYTH
FORTVALLEY
FRANKLIN
GAINESVL
GEORGETOWN
GIBSON
GRANTVILLE
GREENSBORO
GREENVILLE
GRIFFIN
HAMILTON
HARLEM
HAZLEHURST

Line Count for GA
Access Integrated Networks, Inc.
As of 11/01/2002

City
HEPHZIBAH
HOGANSVL
JACKSON
JEKYLL IS
JESUP
JOHNSONCOR
KINGSTON
LAGRANGE
LAKE PARK
LEARY
LEESBURG
LOUISVILLE
LULA
LUMBERCITY
LUMPKIN
LUTHERSVL
LYONS
MACON
MADISON
MCCAYSVL
MILLEN
MONTICELLO
NEWNAN
NEWTON
PELHAM
PINE MT
POOLER
RICHLAND
ROCKMART
ROME
ROOPVILLE
ROSSVILLE
ROYSTON
RUTLEDGE
SANDERSVL
SANDY SPG
SARDIS
SAVANNAH
SENOIA
SMITHVILLE
SOCIALCRCL
SPARKS
SPARTA
STSIMONSIS
SWAINSBORO
SYLVESTER
TALLAPOOSA
TEMPLE
THOMASVL
THOMSON
TIFTON
TYBEE IS
VALDOSTA
VIDALIA
VILLA RICA
WADLEY
WARNERRBNS

Line Count for GA
Access Integrated Networks, Inc.
As of 11/01/2002

City
WARRENTON
WATKINSVL
WAYCROSS
WAYNESBORO
WOODBURY
WRENS
WRIGHTSVL
ZEBULON

Line Count for KY
Access Integrated Networks, Inc.
As of 11/01/2002

City
ALLEN
AURORA
BARDSTOWN
BEATTYVL
BEAVER DAM
BEDFORD
BENTON
BOWLNGGREN
BREMEN
CADIZ
CAMPBELSBG
CANTON
CARLISLE
CARROLLTON
CAYCE
CENTERTOWN
CENTRAL CY
CLAY
CLINTON
CLOVERPORT
CORBIN
CORYDON
CRAB ORCH
CYNTHIANA
DANVILLE
DAWSON SPG
DIXON
DRAKESBORO
EDDYVILLE
ELKHORN CY
ELKTON
EMINENCE
ENSOR
FINCHVILLE
FORD
FRANKFORT
FRANKLIN
FREDONIA
FULTON
GEORGETOWN
GHENT
GILBERTSVL
GREENVILLE
GUTHRIE
HABIT
HARDINSBG
HARLAN
HARRODSBG
HARTFORD
HENDERSON
HOPKINSVL
INEZ
ISLAND
JACKSON
JUNCTIONCY
LA GRANGE
LAWRENCEBG

Line Count for KY
Access Integrated Networks, Inc.
As of 11/01/2002

City
LEBANONJCT
LOUISA
LOUISVILLE
MADISONVL
MARION
MARTIN
MAYFIELD
MAYSVILLE
MCDANIELS
MCDOWELL
MIDDLESBO
MILTON
MORGANFLD
MORGANTOWN
MTSTERLING
MURRAY
NEON
NEW HAVEN
NOMIDDLETN
OAK GROVE
OWENSBORO
OWENTON
PADUCAH
PAINTSVL
PANTHER
PARIS
PEMBROKE
PIKEVILLE
PINEVILLE
PLEASATRDG
PRESTONSBG
PRINCETON
PROVIDENCE
RICHMOND
ROBARDS
ROSETRRACE
RUSSELLVL
SADIEVILLE
SEBREE
SHELBYVL
SOWILLIMSN
SPRINGFLD
ST CHARLES
STANFORD
STANTON
STURGIS
TAYLORSVL
UTICA
VIRGIE
WACO
WALLINSCRK
WARFIELD
WAYLAND
WHITESBURG
WHITESVL
WILLIAMSBG
WINCHESTER

11/01/2002
39:56 AM

Line Count for KY
Access Integrated Networks, Inc.
As of 11/01/2002

City

Line Count for LA
Access Integrated Networks, Inc.
As of 11/01/2002

City
ABBEVILLE
ALBANY
ALEXANDRIA
AMITE CITY
ARCADIA
BALDWIN
BASTROP
BATONROUGE
BENTON
BERNICE
BLANCHARD
BOGALUSA
BOUTTE
BROUSSARD
BUNKIE
BURAS
BUSH
CALHOUN
CALVIN
CANE RIVER
CARENCRO
CASTOR
CENTERVL
CHACKBAY
CLINTON
COLFAX
COLUMBIA
CONVENT
CONVERSE
COUSHATTA
COVINGTON
CROWLEY
CROWVILLE
DE RIDDER
DELHI
DENHAM SPG
DONALDSNVL
DOWNSVILLE
DRY PRONG
DULAC
DUSON
EDGARD
EPPS
ERATH
EUNICE
FARMERVL
FERRIDAY
FLORIEN
FOLSOM
FRANKLIN
FRANKLINTN
FTNECESSTY
GIBSLAND
GRAMBLING
GRAND CANE
GREENWOOD
GUEYDAN

Line Count for LA
Access Integrated Networks, Inc.
As of 11/01/2002

City
HAHNVILLE
HAMMOND
HARAHAN
HAUGHTON
HAYNESVL
HESSMER
HOMER
HORNBECK
HOUMA
INDEPNDNCE
JACKSON
JEANERETTE
JENNINGS
JESUITBEND
JONESBORO
JONESVILLE
KEATCHIE
KEITHVILLE
KENNER
KENTWOOD
KROTZ SPG
LABADIEVL
LACOMBE
LAFAYETTE
LAFITTE
LAKEARTHUR
LAPLACE
LAWTELL
LECOMPTE
LEESVILLE
LEONVILLE
LIVINGSTON
LK CHARLES
LKPROVIDNC
LOCKPORT
LOGANSPOORT
LOREAUVL
LUTCHER
MADISONVL
MANDEVILLE
MANSFIELD
MANY
MARKSVILLE
MELVILLE
MER ROUGE
MINDEN
MONROE
MONTEGUT
MONTEREY
MONTGOMERY
MOORINGSPT
MORGANCITY
MORGANZA
NAPOLEONVL
NATCHITCHS
NEW IBERIA
NEW ROADS

Line Count for LA
Access Integrated Networks, Inc.
As of 11/01/2002

City
NEWELLTON
NEWORLEANS
NORCO
OAK GROVE
OAKDALE
OIL CITY
OPELOUSAS
PARADIS
PATTERSON
PEARLRIVER
PIERREPART
PINE
PLAQUEMINE
POLLOCK
PONCHATOUL
PORT BARRE
RACELAND
RAYNE
RAYVILLE
ROBELINE
ROUGON
RUSTON
SALINE
SHREVEPORT
SICILY IS
SIMPSON
SLIDELL
SPRINGFLD
ST BERNARD
ST GABRIEL
ST JOSEPH
STERLINGTN
STFRNCISVL
STMARTINVL
SULPHUR
TALLULAH
THIBODAUX
VACHERIE
VENICE
VIDALIA
VINTON
WASHINGTON
WEEKS IS
WH CASTLE
WILSON
WINNFIELD
WINNSBORO
YOUNGSVL
ZACHARY
ZWOLLE

Line Count for MS
Access Integrated Networks, Inc.
As of 11/01/2002

City
ABERDEEN
AMORY
ASHLAND
BALDWYN
BATESVILLE
BAYSTLOUIS
BELMONT
BELZONI
BENOIT
BILOXI
BLUE MT
BOLTON
BOONEVILLE
BRANDON
BROOKHAVEN
BUCKATUNNA
BURNSVILLE
CALEDONIA
CANTON
CARROLLTON
CARTHAGE
CENTREVL
CHARLESTON
CLARKSDALE
CLEVELAND
CLINTON
COFFEEVL
COLDWATER
COLLINS
COLUMBIA
COLUMBSAFB
COLUMBUS
COMO
CORINTH
CRENSHAW
CRYSTALSPG
DE KALB
DREW
DUCK HILL
DURANT
ELLISVILLE
ETHEL
EUPORA
FAYETTE
FOREST
GLOSTER
GOODMAN
GREENVILLE
GREENWOOD
GRENADA
GULFPORT
HARPERVL
HATTIESBG
HAZLEHURST
HEIDELBERG
HERNANDO
HOLLANDALE

Line Count for MS
Access Integrated Networks, Inc.
As of 11/01/2002

City
HOLLY SPG
HOUSTON
HURLEY
INDIANOLA
INVERNESS
ITTA BENA
IUKA
JACKSON
KILMICHAEL
KOSCIUSKO
LAKE
LAUREL
LELAND
LEXINGTON
LIBERTY
LOUISVILLE
LUCEDALE
LULA
LUMBERTON
LYNVILLE
MABEN
MACON
MADISON
MAGEE
MAGNOLIA
MARKS
MCCOMB
MCCOOL
MCLAIN
MEMPHIS
MENDENHALL
MERIDIAN
MIZE
MONTICELLO
MOORHEAD
MORTON
MOSS POINT
MOUNTOLIVE
MTPLEASANT
NATCHEZ
NETTLETON
NEW ALBANY
NEWTONHKRY
OAKLAND
OBADIAH
OCEAN SPG
OKOLONA
OSYKA
OXFORD
PASCAGOULA
PASSCHRSTN
PELAHATCHI
PHILA
PICAYUNE
PICKENS
PONTOTOC
POPLARVL

Line Count for MS
Access Integrated Networks, Inc.
As of 11/01/2002

City
PORTGIBSON
PURVIS
QUITMAN
RALEIGH
RAYMOND
RICHTON
RIPLEY
ROLLNGFORK
ROSEDALE
RULEVILLE
SARDIS
SCOوبا
SEMINARY
SENATOBIA
SHAW
SHELBY
SHUBUTA
SHUQUALAK
STARKVILLE
SUMNER
SUMRALL
TAYLORSVL
TCHULA
TERRY
TUNICA
TUPELO
TUTWILER
TYLERTOWN
UNION
UTICA
VAIDEN
VANCLEAVE
VERONA
VICKSBURG
WALNUT
WATER VLY
WAYNESBORO
WESSON
WEST POINT
WIGGINS
WINONA
WOODVILLE
YAZOO CITY

Line Count for NC
Access Integrated Networks, Inc.
As of 11/01/2002

City
ACME
APEX
ARDEN
ASHEVILLE
BELMONT
BESSEMER
BLACK MT
BLOWING RK
BOONE
BURGAW
BURLINGTON
CANTON
CAROLINBCH
CARY
CARY-RTP
CASTLEHAYN
CHAPELHILL
CHARLOTTE
CHERRYVL
CLYDE
DAVIDSON
DENVER
ENKACANDLR
FAIRMONT
FAIRVIEW
FORESTCITY
GASTONIA
GOLDSBORO
GRANTHAM
GREENSBORO
GROVER
HAMLET
HENDERSNVL
HUNTERSVL
JULIAN
KIMESVILLE
KINGS MT
KNIGHTDALE
LAKE LURE
LATTIMORE
LAURINBURG
LAWNDALE
LEICESTER
LENOIR
LIBERTY-CH
LINCOLNTON
LOCUST
LOWELL
LUMBERTON
MAGGIE VLY
MORGANTON
MOUNTHOLLY
MOUNTOLIVE
NEWLAND
NEWTON
PEMBROKE
RALEIGH

Line Count for NC
Access Integrated Networks, Inc.
As of 11/01/2002

City
REIDSVILLE
ROCKINGHAM
ROWLAND
RUTHEFRDTN
SALISBURY
SCOTTSHILL
SHELBY
SOUTHPORT
SPRUCEPINE
STANLEY
STATESVL
SUMMERFLD
SWANNANOA
TROUTMAN
WAYNESVL
WENDELL
WILMINGTON
WINSTN SAL
WRGHTSVBCH
ZEBULON

Line Count for SC
Access Integrated Networks, Inc.
As of 11/01/2002

City
AIKEN
ALLENDALE
ANDERSON
ANTIOCH
BAMBERG
BARNWELL
BATESBURG
BATH
BEECH IS
BELTON
BENNETTSVL
BLACKSBURG
BLACKVILLE
BLUE RIDGE
CAMDEN
CENTRAL
CHARLESTON
CHERAW
CHPNLTLMTN
CHPNLTLMTS
CLEMSON
CLINTON
CLOVER
COLUMBIA
COWPENS
DARLINGTON
DENMARK
DILLON
EASLEY
EASTOVER
EDGEFIELD
EDISTO IS
FLORENCE
FOUNTAINNN
GAFFNEY
GRANITEVL
GREENVILLE
GREER
HARTSVILLE
HICKORYGRV
HONEA PATH
ISLE PALMS
JOANNA
JOHNSTON
JONESVILLE
LAKE VIEW
LAKE WYLIE
LATTA
LIBERTY
LK WYLIE W
LYMAN
MARION
MCCOLL
MTPLEASANT
MULLINS
NEWBERRY
NEWELLENTN

Line Count for SC
Access Integrated Networks, Inc.
As of 11/01/2002

City
NICHOLS
NO AUGUSTA
OLAR
ORANGEBURG
PACOLET
PELZER
PENDLETON
PICKENS
PIEDMONT
PROSPERITY
SALEM
SENECA
SHARON
SIX MILE
SOCIETY HL
SPARTANBG
SRNGFLSLLY
ST GEORGE
SULLIVNSIS
SUMMERVL
TIMMONSVL
TRAVESREST
UNION
W COLUMBIA
WALHALLA
WESTMINSTR
WHITMIRE
WILLIAMSTN
YORK

Line Count for TN
Access Integrated Networks, Inc.
As of 11/01/2002

City
ADMSCDARHL
ARLINGTON
ASHLAND CY
ATHENS
BEAN STATN
BELLS
BENTCREEK
BENTON
BETHEL SPG
BIG SANDY
BLANCHE
BOLIVAR
BROWNSVL
BULLS GAP
CAMDEN
CARTHAGE
CEDARGROVE
CENTERVL
CHAPELHILL
CHARLESTON
CHATTNOOGA
CHESTNUTHI
CLARKSVL
CLEVELAND
CLINTON
COLLIERVL
COLUMBIA
COPPERBSIN
COVINGTON
CULLEOKA
CUMBERLDGP
DANDRIDGE
DAYTON
DECATUR
DICKSON
DOVER
DYER
DYERSBURG
ELKTON
ETOWAH
FAYETTEVL
FLINTVILLE
FRANKLIN
GALLATIN
GATLINBURG
GEORGETOWN
GIBSON
GLEASON
GOODLETSL
GRAND JCT
GREENBRIER
GREENFIELD
HALLS
HAMPSHIRE
HARRIMAN
HARTFORD
HENDERSNVL

Line Count for TN
Access Integrated Networks, Inc.
As of 11/01/2002

City
HENDERSON
HENNING
HOHENWALD
HORNBEAK
HUMBOLDT
HUNTINGDON
HUNTLAND
JACKSON
JASPER
JEFFERSNCY
JELICO
KENTON
KINGSTNSPG
KINGSTON
KNOXVILLE
LAFOLLETTE
LAGRANGE
LAKE CITY
LAWRENCEBG
LEBANON
LENOIRCITY
LEWISBURG
LEXINGTON
LOUDON
LYLES
LYNCHBURG
LYNNVILLE
MADISONVL
MANCHESTER
MARYVILLE
MASCOT
MAYNARDVL
MCEWEN
MCKENZIE
MEDINA
MEMPHIS
MIDDLETON
MILAN
MORRISTOWN
MOSCOW
MTPLEASANT
MURFREESBO
NASHVILLE
NEWBERN
NEWPORT
NSPRINGHIL
OAK RIDGE
OLDHICKORY
OLIVER SPG
PARIS
PETERSBURG
PLEASANTVW
PORTLAND
PULASKI
RIDGELY
RIPLEY
ROCKWOOD

Line Count for TN
Access Integrated Networks, Inc.
As of 11/01/2002

City
ROGERSVL
SANGO
SAVANNAH
SELMER
SEVIERVL
SEWANEE
SHELBYVL
SMYRNA
SNEEDVILLE
SO FULTON
SO PITTSBG
SODDYDAISY
SOFREDONIA
SOLWAY
SOMERVILLE
SPENCERMIL
SPRINGCITY
SPRINGFLD
SPRINGHILL
SUMMERTOWN
SURGOINSVL
SWEETWATER
TOWNSEND
TRENTON
TROY
TULLAHOMA
UNION CITY
WARTRACE
WAVERLY
WHITE PINE
WHITEBLUFF
WHITEHOUSE
WHITEVILLE
WHITWELL
WINCHESTER